

FILED**UNITED STATES DISTRICT COURT**

for the

Eastern District of California

JAN 03 2024

Division

CLERK U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

BY

DEPUTY CLERK

SAMUEL DEREK JACKSON, pro per

*Plaintiff(s)**(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

-v-

DARRELL WORTHY
CYNTHIA WORTHY*Defendant(s)**(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)*

Case No. 1:23-cv-01223-JLT-HBK

(to be filled in by the Clerk's Office)

Jury Trial: (check one) ☐ Yes ☐ No**RECEIVED**

JAN 03 2024

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY _____ DEPUTY CLERK**COMPLAINT FOR A CIVIL CASE****I. The Parties to This Complaint****A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name SAMUEL DEREK JACKSON

Street Address 1633 E. Bianchi Rd. #131

City and County Stockton- San Joaquin County

State and Zip Code California 95210

Telephone Number 916-891-8511

E-mail Address sjnac1269@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	DARREL WORTHY
Job or Title <i>(if known)</i>	Janitor
Street Address	2005 Faith Avenue
City and County	Bakersfield-Kern County
State and Zip Code	California 93304
Telephone Number	661-833-0934
E-mail Address <i>(if known)</i>	na

Defendant No. 2

Name	Cynthia Worthy
Job or Title <i>(if known)</i>	na
Street Address	2005 Faith Avenue
City and County	Bakersfield-Kern County
State and Zip Code	California 93304
Telephone Number	661-833-0934
E-mail Address <i>(if known)</i>	na

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

Plaintiff, SAMUEL DEREK JACKSON, by and thru ex parte requests a collateral review on claim of actual innocence challenging violations against his constitutional rights: 1. 5th Amend.-due process FERRERA v U.S. 456 F.3d 278(1 Cir. 2006); 2. 14th Amend.-preponderance of the evidence rule(In RE WINSHIP,2010); CA Code of Civ.Proc. sect.335.7-discovery rule, FOX,supra,35 Cal 4th 803 .

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* _____, is a citizen of the State of *(name)* _____.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) _____, is incorporated under the laws of the State of (name) _____, and has its principal place of business in the State of (name) _____.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

[see attachments]

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

[see attachments]

III. STATEMENT OF CLAIM:

In November 2001, the Plaintiff(a United States citizen) , who lived with his fiancée Charlesa C.Moorings[CCM], her daughter Chandra V. Moore[CVM], and his biological son Trevian D. Jackson lived in Bakersfield,CA until May 2001),was arrested and detained at Santa Rita County Jail, Pleasanton-CA then extradited to Kern County Jail, Bakersfield,CA and charged with LOL w/force on a minor. Trial was set in Kern County Superior Court[KCSC]-SCO83323A under presiding Judge Robert A. Baca, of which the trial ended in a mistrial on January 31, 2002(8 to 4 for acquittal) that the judge stated that there was"no evidence of the allegation claimed by the prosecution.. That they do not retry the case .. there was no signs of sexual abuse .. neither physical nor psychological according to Expert Witness for the prosecution ..but there were signs of duress applied by her grandparents,who were actively involved with their son Clema Moore in a custody dispute[Exhibit B,C].

On March 13, 2002, the Plaintiff was retried by the prosecution in Kern Co. Sup. Ct. with an offer of 6yrs, which was not accepted by the Plaintiff and he was convicted on March 13, 2002, was sentenced to 17 yrs at 85% (totalling 14 1/2 yrs plus 5 yrs. parole and mental health counseling).

On July 7th of 2023, the Plaintiff in this matter received a certified letter from the alleged victim of this case Chandra Venessa Moore(CVM), enclosed was a notarized letter sworn in the State of California, County of Santa Clara, confirming that the Plaintiff is actually innocent of any wrongdoing against her person [Exhibits A]

Prior to either trial proceedings, the court records would reveal the fact of the active custody dispute between parties CCM and Clema Moore[Exhibit B,C] with Darrell Worthy[DW]and Cynthia Worthy

[CW] his parents, who had been guardians of CVM over the summer of 2000. CVM had reported to her mother CCM, that DW and CW were forcing her to spread false accusations against the Plaintiff, the same day both DW and CW filed criminal charges against the Plaintiff with Child Protective Services and adjoined the father to pursue custody of CVM to effectively ~~prevent~~ ^{prevent} CCM from retrieving CVM from her father's family. It was later discovered, in court hearings, that CVM had endured a series of interrogations, first by DW, who until CVM finally gave into demands one hot summer on the 4th of July, each of them sitting on buckets outside in the summer of 2000 over a course of several hours.

The testimony of DW, as witness for the prosecution weighed heavy against the Plaintiff, of which DW was admonished on multiple occasions by Judge Baca [01/31/02], who stated in open court that there were signs of " duress"[a threat of force, violence, danger, or retribution against..a family member, sufficient to coerce a reasonable person of ordinary susceptibilities to perform, or to acquiesce to an act to which the person would otherwise not have acquiesced], was displayed by CVM on behalf of her grandparents. DW was not brought forward as witness for the prosecution in a 2nd subsequent trial although his testimony was utilized through secondary means..against the 6th Amend. Right to be confronted by the witness(es) against him.

It was CW, who testified on his behalf of his claims,who also having had the privilege to sit throughout both trial proceedings, was not sequestered at any time prior to taking the witness stand, this 2nd-hand testimony would ultimately help secure the Plaintiff's criminal conviction.

The legal definition of the "hearsay rule" under CA Evid. Code sect.1200 says"(a)..evidence of a statement that was made other than by a witness while testifying at the hearing, and that is offered to prove the truth of the matter stated..except as provided by law..is inadmissible. This rule is based on the principle that hearsay is often unreliable, and can not be cross-examined.

IV. RELIEF

Plaintiff seeks collateral relief by judicial review of all the law and facts in question, as to the validity and constitutionality of his conviction, and consideration of injurious effects endured for the duration of his incarceration, and the affects the stigma attached to his lifetime criminal classification as result of his wrongful conviction[SCO83323A-KCSC], and in light of the newly discovered evidence[Exhibit A], sufficient enough to raise reasonable doubt in the mind of the fact-finder, as the burden of proof shifts to the prosecution based upon the preponderance of the evidence rule, in re Winship(2010). The Plaintiff believes that his case would turn on how a jury would resolve complicated questions of facts, which were not presented nor admitted during his 2nd jury trial that had resulted in his conviction. In general, the prosecution's evidence must overcome the defendant's presumption of innocence, which is constitutionally guaranteed as due process of law, In re Winship 2010. If even the slightest chance that the defendant is innocent, the case most likely lacks the convincing and credible evidence..the trier of fact should acquit the defendant.

Substantive due process is the principle that the 5th and 14th Amendments protect fundamental rights from governmental interference..prohibiting the government from depriving any person of ..life ..liberty..or property interest without due process of law..the person must be given notice, the opportunity to be heard, and a decision by a neutral decision-maker. When the government presents perjurious testimony..a due process claim cognizable in sect. 2255 proceedings arises 5th Amendment- due process, Ferrera v. U.S. 456 F.3d 278(1st Cir.2006); U.S. v Biberfeld 957 F. 2d 98(3rd Cir. 1991). False evidence-the constitutional requirement of substantial equality and fair process under the 14th Amendment. Adequate factual allegations stating a prima facie case for entitlement to relief [under sect. 1473.7]..a petitioner no longer has to prove innocence but rather must show that the new evidence.. in relation to the evidence actually presented at trial-would raise a reasonable doubt as to guilt. The federal rule requires that a motion based on newly discovered evidence be filed within 3yrs.. it may only be granted "In the interest of justice", if prior diligence had been exercised in seeking such evidence" among the other requirements."

Injury to a person-CA Code of Civil Proc. sect. 335.1- to win a negligence lawsuit, the victim must establish 4 elements: 1) the wrongdoer owed a duty to the victim; 2) that the wrongdoer breached the duty; 3) the breach caused the injury; and 4) the victim suffered damages. Under the preponderance standard..the burden of proof is met where the party with the burden has convinced the fact-finder that there is a greater than 50 percent chance that the claim is true. A movant claiming actual innocence must present new reliable evidence-whether it be exculpatory ..scientific..or trustworthy eyewitness accounts or critical physical evidence.. not present at trial, Schlup v Delo 513 U.S. 298, 324(1995);discovery- Smith v Davis, 953 F.3d 582 (9th Cir. 2020).

In Bousley v U.S. 523 U.S. 623-24(1998)..the Supreme Court said that actual innocence is factual innocence..to establish actual innocence..petitioner must demonstrate that, in light of all evidence, it is more likely than not no reasonable juror would have convicted him, McQuiggin v Perkins,133 S.Ct. 1924. The actual innocence exception, in the court's view, is a .. fundamental miscarriage of justice exception grounded in the equitable discretion of habeas courts to see that the federal constitutional errors did not result in the incarceration of innocent persons.

According to CA Penal Code sect. 4900- factual findings and credibility determinations establish the court basis for granting writ of habeas corpus, motion for a new trial, or certificate

of factual innocence. The statute of limitations for some crimes will begin when the offense, violation, or wrongdoing is discovered or could have been discovered- CA discovery rule-for criminal cases, CA Code of Civ. Proc. 337.5- discovery rule Fox, supra, 35 Cal. 4th 803. A plaintiff's inability to discover a cause of action may occur when it is difficult for the plaintiff to observe or understand the breach of duty, or when the injury(or its cause) is hidden or beyond what the ordinary person could be expected to understand, NBCUniversal Media,LLC v Superior Court(2014)225 Cal.App.4th 1222, 1232{171 Cal.Rptr.3d 1}.

Plaintiff JACKSON, proceeding pro per and in forma is filing this civil COMPLAINT under 42 U.S.C. sect.1983. The COMPLAINT challenges conviction and sentence in Kern County Superior Court[SCO83323A]. As relief, Plaintiff requests a "collateral review" of his conviction, a new trial, or a finding that he is "actually innocent" of all charges of which he was convicted of, as well as monetary damages of the equivalency of \$140.00 for each day he spent behind bars against Defendants Darrell and Cynthia Worthy in this matter, for the undue harm their actions cause upon the Plaintiff and his constitutional rights.

The Plaintiff also asserts that he has filed a NOTICE OF MOTION and MOTION TO VACATE his conviction under CA PC 1473.7 pro per, that is pending and currently under review in Kern County Superior Court of California- People of the State v SAMUEL DEREK JACKSON case no.SCO83323A.

In Sacramento, the Victim Compensation Board and Government Claims Board..is supposed to see to it that wrongfully convicted defendants who are innocent receive..\$140 per day (amended 2016 by CALV.C.B) for each day spent behind bars.

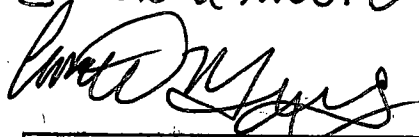
Pursuant to the above considerations of law and fact, the Plaintiff respectfully requests this honorable Court retain jurisdiction in this matter, to rule over the present dispute, and offer any additional remedies available to it, in order to proceed further into the cause of action before it.

A.

To Whom it may Concern,

I Chandra Venessa Moore swear that The
Charges Brought Against Samuel D. Jackson
Involving me as A victim are false. I write this
Statement of Sound mind.

Chandra Moore

 July 5th 2023

A notary public or other officer completing this certificate verifies only the identity of the individual who signed the document to which this certificate is attached, and not the truthfulness, accuracy, or validity of that document.

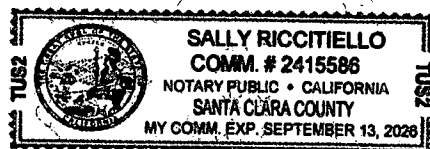
State of California

County of Santa Clara

Subscribed and sworn to (or affirmed) before me on
this 5 day of July, 2023 by Chandra Moore

proven to me on the basis of satisfactory evidence to
be the person(s) who appeared before me.





ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): Clema H. Moore III 2005 Faith Avenue Bakersfield, CA 93304 TELEPHONE NO.: ATTORNEY FOR (Name) (661) 833-2582 FAX NO.: SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: 1415 Truxtun Avenue MAILING ADDRESS: CITY AND ZIP CODE: Bakersfield, Ca 93301 BRANCH NAME: PETITIONER/PLAINTIFF: Charlesa Moorings RESPONDENT/DEFENDANT: Clema H. Moore III		FOR COURT USE ONLY FILED KERN COUNTY JUL - 9 2001 TERRY McNALLY CLERK BY _____ DEPUTY WARRANT FOR ARREST MEDIATION MAY RESULT IN A MODERATELY INCREASED CASE NUMBER: 12815
ORDER TO SHOW CAUSE FOR <input checked="" type="checkbox"/> Child Custody <input checked="" type="checkbox"/> Visitation <input type="checkbox"/> Injunctive Order <input type="checkbox"/> Child Support <input type="checkbox"/> Spousal Support <input type="checkbox"/> Other (specify): <input type="checkbox"/> Attorney Fees and Costs <input type="checkbox"/> MODIFICATION		

1. TO (name): Charlesa Moorings
2. YOU ARE ORDERED TO APPEAR IN THIS COURT AS FOLLOWS TO GIVE ANY LEGAL REASON WHY THE RELIEF SOUGHT IN THE ATTACHED APPLICATION SHOULD NOT BE GRANTED. If child custody or visitation is an issue in this proceeding, Family Code section 3170 requires mediation before or concurrently with the hearing listed below.

a. Date: 8-3-01 Time: 8:30 AM ☒ Dept: 9 ☐ Rm.: posted

b. Address of court ☒ same as noted above ☐ other (specify):

c. ☒ The parties are ordered to attend custody mediation services as follows:

BOTH PARTIES ARE ORDERED TO
APPEAR AT MEDIATION ON 8/3
AT 8:15, 1415 TRUXTUN AVE.
ROOM 603, (661) 868-4530. Children 8
years and older must be available during
mediation.

3. IT IS FURTHER ORDERED that a completed Application for Order and Supporting Declaration, a blank Responsive Declaration, and the following documents shall be served with this order:

- a. (1) ☐ Completed Income and Expense Declaration and a blank Income and Expense Declaration
(2) ☐ Completed Financial Statement (Simplified) and a blank Financial Statement (Simplified)
(3) ☐ Completed Property Declaration and a blank Property Declaration
(4) ☐ Points and authorities
(5) ☐ Other (specify):

b. ☐ Time for ☐ service ☐ hearing is shortened. Service shall be on or before (date):
Any responsive declaration shall be served on or before (date):

c. ☒ You are ordered to comply with the temporary orders attached.
d. ☐ Other (specify):

Date:

JUDGE OF THE SUPERIOR COURT

NOTICE: If you have children from this relationship, the court is required to order payment of child support based on the income of both parents. The amount of child support can be large. It normally continues until the child is 18. You should supply the court with information about your finances. Otherwise, the child support order will be based on the information supplied by the other parent.

You do not have to pay any fee to file responsive declarations in response to this order to show cause (including a completed Income and Expense Declaration (form 1285.50) or Financial Statement (Simplified) (form 1285.52) that will show your finances). In the absence of an order shortening time, the original of the responsive declaration must be filed with the court and a copy served on the other party at least five court days before the hearing date.

ORDER TO SHOW CAUSE
(Family Law-Uniform Parentage)

PLAINTIFF/PETITIONER:
 DEFENDANT/RESPONDENT:

CASE NUMBER:

FINANCIAL INFORMATION

8. ☐ My pay changes considerably from month to month. *[If you check this box, each of the amounts reported in item 9 should be your average for the past 12 months.]*

9. MY MONTHLY INCOME

- a. My gross monthly pay is: \$ 0
- b. My payroll deductions are (specify purpose and amount):
- (1) \$ _____
- (2) \$ _____
- (3) \$ _____
- (4) \$ _____

My TOTAL payroll deduction amount is: \$ 0

- c. My monthly take-home pay is (a. minus b.): \$ 0

- d. Other money I get each month is (specify source and amount; include spousal support, child support, parental support, support from outside the home, scholarships, retirement or pensions, social security, disability, unemployment, military basic allowance for quarters (BAQ), veterans payments, dividends, interest or royalty, trust income, annuities, net business income, net rental income, reimbursement of job-related expenses, and net gambling or lottery winnings):

- (1) \$ _____
- (2) \$ _____
- (3) \$ _____
- (4) \$ _____

The TOTAL amount of other money is: \$ 0
 (If more space is needed, attach page labeled Attachment 9d.)

e. MY TOTAL MONTHLY INCOME IS

- (c. plus d.): \$ 0

- f. Number of persons living in my home: self
 Below list all the persons living in your home, including your spouse, who depend in whole or in part on you for support, or on whom you depend in whole or in part for support:

	Name	Age	Relationship	Gross Monthly Income
(1)				\$ _____
(2)				\$ _____
(3)				\$ _____
(4)				\$ _____
(5)				\$ _____

The TOTAL amount of other money is:
 (If more space is needed, attach page labeled Attachment 9f.)

g. MY TOTAL GROSS MONTHLY HOUSEHOLD INCOME IS

- (a. plus d. plus f.): \$ _____

10. I own or have an interest in the following property:

- a. Cash \$ _____
- b. Checking, savings and credit union accounts (list banks):
- (1) \$ _____
- (2) \$ _____
- (3) \$ _____
- (4) \$ _____

10. c. Cars, other vehicles, and boats (list make, year, fair market value (FMV), and loan balance of each):

Property	FMV	Loan Balance
(1) _____	\$ _____	\$ _____
(2) _____	\$ _____	\$ _____
(3) _____	\$ _____	\$ _____

- d. Real estate (list address, estimated fair market value (FMV), and loan balance of each property):

Property	FMV	Loan Balance
(1) _____	\$ _____	\$ _____
(2) _____	\$ _____	\$ _____
(3) _____	\$ _____	\$ _____

- e. Other personal property - jewelry, furniture, furs, stocks, bonds, etc. (list separately):

11. My monthly expenses not already listed in item 9b above are the following:

- a. Rent or house payment & maintenance \$ _____
- b. Food and household supplies \$ _____
- c. Utilities and telephone \$ _____
- d. Clothing \$ _____
- e. Laundry and cleaning \$ _____
- f. Medical and dental payments \$ _____
- g. Insurance (life, health, accident, etc.) \$ _____
- h. School, child care \$ _____
- i. Child, spousal support (prior marriage) \$ _____
- j. Transportation and auto expenses (insurance, gas, repair) \$ _____

- k. Installment payments (specify purpose and amount):

- (1) \$ _____
- (2) \$ _____
- (3) \$ _____

The TOTAL amount of monthly installment payments is: \$ _____

- l. Amounts deducted due to wage assignments and earnings withholding orders: \$ _____

- m. Other expenses (specify):

- (1) \$ _____
- (2) \$ _____
- (3) \$ _____
- (4) \$ _____
- (5) \$ _____

The TOTAL amount of other monthly expenses is: \$ _____

- n. MY TOTAL MONTHLY EXPENSES ARE (add a. through m.): \$ _____

12. Other facts which support this application are (describe unusual medical needs, expenses for recent family emergencies, or other unusual circumstances or expenses to help the court understand your budget; if more space is needed, attach page labeled Attachment 12): I am a student and I am currently unemployed. My family is helping me out.

WARNING: You must immediately tell the court if you become able to pay court fees or costs during this action. You may be ordered to appear in court and answer questions about your ability to pay court fees or costs.

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

12/26/23

Signature of Plaintiff

Samuel D. Jackson

Printed Name of Plaintiff

SAMUEL DEREK JACKSON, pro per**B. For Attorneys**

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

12/26/23

Signature of Plaintiff

Samuel D. Jackson

Printed Name of Plaintiff

SAMUEL DEREK JACKSON, pro per**B. For Attorneys**

Date of signing: _____

Signature of Attorney _____

Printed Name of Attorney _____

Bar Number _____

Name of Law Firm _____

Street Address _____

State and Zip Code _____

Telephone Number _____

E-mail Address _____